
VERIFICATION GUIDANCE

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School Food Service Section
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TABLE OF CONTENTS

	<u>Page</u>
1. Introduction	1
2. Verification of Eligibility for School Meals.....	2
Definition	2
Exemptions from Verification	2
General Requirements	2
Confirming Official.....	3
Implementation.....	3
Follow-up Activities.....	3
Declining 5 Percent of Sample Selection	4
Basic Sample Size Method.....	4
Error-Prone Applications	4
Non-Response Rate	4
Alternate Sample Size Method.....	4
Alternate I (Random).....	5
Alternate II (Focused)	5
Verification at the Time of Application	7
Household Notification of Selection for Verification	8
Verification Methods.....	9
Verification of Income Eligibility	10
Verification of Categorical Eligibility.....	11
Completion of Verification	12
Verification Results.....	13
Notification of Adverse Action	14
Benefits During Appeal of Verification Results	14
Hearing Procedure.....	14
Households that Reapply for Program Benefits	14
Recordkeeping.....	14
3. Questions and Answers	16
4. Basic Sample Size Worksheet.....	18
5. Alternate I (Random) Sampling Worksheet	19
6. Alternate II (Focused) Sampling Worksheet.....	19
7. Letter to Households – Notification of Selection for Verification	20
8. Social Security Numbers	21
9. Verification Information for Free and Reduced Price Meals	22
10. Letter Household May Have Employer Complete - Statement of Earnings	23
11. Letter Household May Have Social Security Office Complete - Social Security and/or Supplemental Security Income	24
12. Letter to the Food Stamp/Temporary Assistance Office from the Local Education Agency	25
13. Verification Form – Food Stamp/Temporary Assistance Recipients	26
14. Letter Household May Have Food Stamp/Temporary Assistance Office Complete – Statement of Benefits.....	27
15. Letter of Verification Results and Adverse Action for Income Households	28
16. Letter of Adverse Action for Food Stamp/Temporary Assistance Households	29
17. Notification of Continuation of Benefits as a Result of Verification	30
18. Free and Reduced Price Application Income Verification Documentation	31
19. Verification Summary	32

INTRODUCTION

Guidance is provided for the verification requirements set forth in regulations issued by the United States Department of Agriculture on June 26, 1984. This guidance sets forth guidelines for school officials responsible for verification of free and reduced price meal applications under the National School Lunch and School Breakfast Programs.

The following explanation of acronyms is provided:

SA	-	State Agency
LEA	-	Local Education Agency
FNS	-	Food and Nutrition Service
FNSRO		Food and Nutrition Service Regional Office
IEGs		Income Eligibility Guidelines
RCCI		Residential Child Care Institution

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Verification of Eligibility for School Meals

Definition

Verification is confirmation of eligibility for free and reduced price meals under the National School Lunch Program or School Breakfast Program. Verification must include either confirmation of income eligibility or confirmation that the child is included in a certified Food Stamp household or Temporary Assistance unit. At State or local discretion, verification may also include confirmation of any other information on the application which is required as a condition of eligibility.

Exemptions from Verification

1. Verification efforts are not required in:
 - a) Instances where children have been approved under Direct Certification procedures or certified as homeless, runaway, or migrant.
 - b) RCCIs, except for applications for any day students attending the institution.
 - c) Schools in which FNS has approved special cash assistance claims based on economic statistics regarding per capita income, e.g., Puerto Rico and the Virgin Islands.
 - d) Schools in which all children are served with no separate charge for food service and no special cash assistance is claimed, e.g., non pricing programs claiming only the paid rate of reimbursement.
 - e) Schools participating in the Special Milk Program (Note: Schools may choose not to count applications for children in split-session kindergarten programs participating in the Special Milk Program in meal program schools when determining the verification sample size.)
 - f) LEAs in which all schools participate in the Special Assistance Certification and Reimbursement Alternatives except in those years in which applications are taken for all children in attendance.

General Requirements

1. Annually, each LEA must select and verify a sample of applications approved for benefits, unless the SA assumes responsibility for verification or the LEA is otherwise exempt from the verification requirement.
2. LEAs must use either a basic sample size method or an alternate sample size method.
3. The required sample size is based on (1) the total number of approved applications on file on October 1 and (2) the non-response rate of the previous school year.
4. The LEA must complete verification of the minimum required sample size by November 15.
5. Verification must take place after the application has been approved even when the LEA requires households to submit documentation of eligibility with the application.

Confirming Official

Of the applications selected, the *confirming official* should confirm the accuracy of the original approval. *Confirming Official* refers to an individual other than the original determining official who must review all applications selected for verification for correct initial approval prior to conducting any other verification activity.

Once the required confirmation review is completed, the LEA may proceed with verification if the initial determination was correct. If the confirmation review indicates that the new eligibility status is to the household's benefit, the LEA should make the changes as soon as possible and proceed with verification. If the confirmation review shows that there should be a decrease in benefits, the LEA proceeds with and completes verification before any notification of a new eligibility status is given. These procedures are designed to avoid the possibility of unnecessary reduction in benefits.

Implementation

1. Although the required sample size methods are based on the number of approved applications on file on October 1, LEAs may begin verification prior to this date. LEAs may project the number of approved applications that they anticipate will be on file on October 1. However, the LEA must compare this estimate with the actual number of applications on file on October 1 and increase the sample size if the total number of approved applications on file exceeds the estimate.
2. LEAs may verify more than the required minimum sample, up to 100 percent of all approved applications, as long as the selection of applications does not involve discrimination against anyone on the basis of race, color, national origin, age, sex, or disability.
3. The LEA has an obligation to verify all questionable applications. The LEA must complete the verification process for all households that have been notified of their selection for verification and have been asked to submit verification information. The LEA must follow-up with any household notified of their selection.
4. **When calculating sample sizes, round all fractions or decimals upward to the nearest whole number.**

Follow-up Activities

The LEA must make at least one attempt to obtain the necessary verification information from households that fail to respond to the initial request for verification. The attempt may be made through the mail, by telephone, by e-mail, or through personal contact. The LEA must document any attempts and the results. If the LEA is unable to verify the household's eligibility status after the follow-up attempt(s), the household's benefits must be terminated through a written notice of adverse action.

LEAs must provide households a means of asking questions about verification by telephone without the household incurring a charge for the call. The LEA may establish a toll-free number or allow the household to reverse the charges if any households in that school district are outside the local calling area. The LEA may also provide different telephone numbers for each local calling area within the school district. The school or LEA should determine the appropriate person to respond to requests for verification assistance. The household must be able to contact a school or LEA official who can either directly assist them or can refer the caller to a specific

person for help. If the household is unable to obtain assistance during their initial call an LEA or school official must attempt to initiate further contact.

The LEA may contract with a third party to assist with the required follow-up activity. Any third party is subject to the confidentiality requirements outlined in the current regulations.

Declining 5 Percent of Sample Selection

On individual case review, LEAs may decline up to 5 percent of their verification sample and replace them with other approved applications. LEAs should consider factors such as household stability and communication difficulties when declining applications.

Basic Sample Size Method

LEAs that had a non-response rate of 20 percent or more for the prior school year must use the Basic Sample Size method for the verification process. The sample size is determined by selecting 3 percent or 3000 (whichever number is lower) of all approved applications. The verification sample size is drawn from error-prone applications. If there are not enough error-prone applications to meet the required sample size, additional applications must be randomly selected from the remaining approved applications.

Error-Prone Applications

Error-prone applications are approved applications indicating income within \$100 monthly or \$1200 annually of the maximum amount allowed for a household of a specific size to receive free or reduced price benefits.

Non-Response Rate

The percentage of approved household applications selected for verification for which verification information has not been obtained. This percentage is determined from the number of approved applications selected for verification during the previous school year. To determine the non-response rate, divide the total number of applications for which no response was received from the household by the total number of applications selected for verification during the previous school year.

Alternate Sample Size Methods

Alternate Sample Size methods may be used by any LEA if the following conditions are met:

1. The non-response rate for the preceding school year is less than 20 percent;
or,
2. For LEAs with more than 20,000 children approved by application (excluding Direct Certification, homeless, runaway, or migrant) for free or reduced price school meals as of October 1; the non-response rate for the preceding school year is at least 10 percent below the verification non-response rate for the second preceding school year.

Alternate I (Random)

The alternate sample size methods for LEAs meeting the above criteria are:

1. Alternate I (Random): sample size is determined by selecting 3 percent or 3000, whichever is less, of all approved applications on file on October 1, selected at random. Calculation and selection of the minimum required number of applications to verify under alternate I sampling method:

- Step 1.** Count the total number of approved applications on file on October 1. Multiply the total by .03. Round decimals upward. At least one application must be verified. e.g., 300 applications x .03 = 9 applications.
- Step 2.** Compare the result in step 1 to 3,000. The sample size is the lesser number. e.g., 9 applications must be verified to meet the required sample size.
- Step 3.** Randomly select the required number of applications.
 - a. A selection interval may be used. This can be accomplished by dividing the total number of approved applications on file in the LEA by the sample size to determine the selection interval (if there are 300 applications on file and 9 are required to be verified, divide 300 by 9 = 33.3. In this case, the selection interval is 33. Number all the applications. Randomly select an application from the total approved, and then choose every 33rd application until 9 applications have been selected.
 - b. Another random method of selection would be to put all the applications in a container and draw the required number of applications.
 - c. Under random selection each application must have equal chance of being selected.

Alternate II (Focused)

2. Alternate II (Focused): The sample size is determined by selecting 1 percent of all approved applications or 1000 (whichever is less) with sample selected from error-prone applications; plus the lesser of .5 percent (half of 1 percent) or 500 applications approved on categorical eligibility (Food Stamp or Temporary Assistance). If there are not enough error-prone applications LEAs must select the remainder to be verified from applications with monthly incomes closest to the eligibility guidelines.

- a. For applications approved based on income information:
1 percent of the total number of all approved applications in the LEA or 1000 applications, whichever is less (the calculation includes applications approved based on income eligibility and those approved based on Food Stamp/Temporary Assistance case numbers). Select the 1 percent from error-prone applications.
- and**
- b. For applications approved based on Food Stamp/Temporary Assistance case numbers (categorical eligibility):
.5 percent (half of 1 percent) of the total number of applications in the

LEA approved based on Food Stamp/Temporary Assistance case numbers or 500 applications, whichever is less. Select the .5 percent from the applications approved based on Food Stamp/Temporary Assistance case numbers.

The calculation of the minimum required number of applications follows:

Step 1. To determine the number of applications with income information that must be verified, count the total number of approved applications on file on October 1. Multiply this number by 1 percent, round any decimals up. e.g., 50 applications with income information plus 250 applications with Food Stamp/Temporary Assistance numbers = 300 total applications $\times .01 = 3$ applications.

Step 2. Compare the result in Step 1 to 1000. The required number of applications with income information to verify is the lesser number. In this case, 3 error-prone applications must be verified.

Step 3. To determine the number of applications with Food Stamp/Temporary Assistance numbers that must be verified, count the number that were approved based on Food Stamp/Temporary Assistance case numbers. Multiply this number by .005, round any decimals up.

e.g., 250 applications with Food Stamp/Temporary Assistance numbers $\times .005 = 1.25 = 2$ applications.

Step 4. Compare the result in Step 3 to 500. The required number of applications with a Food Stamp/Temporary Assistance number to verify is the lesser number. In this example, 2 applications approved based on Food Stamp/Temporary Assistance case numbers must be verified.

Step 5. Separate the applications into two groups: (1) the categorically eligible applicants that provided a Food Stamp/Temporary Assistance case number; and (2) the applicants that were approved on the basis of income information.

Step 6. From the group that reported income information, select the required sample size (as determined in Step 2) from applications with monthly incomes within \$100 or annual income within \$1200 of the income eligibility limits.

If there are more applications with monthly income within these limits than needed to meet the minimum sample size, select the sample using any method that is equitable and ensures that the same households will not be selected year after year.

If there are not enough error-prone applications within the limits to meet the required minimum sample size, complete the sample using those applications with monthly income closest to the eligibility levels.

Step 7. From the Food Stamp/Temporary Assistance case number group, select the sample using any method that is equitable and ensures that the same household is not selected each year.

A minimum of one Food Stamp/Temporary Assistance case number application and one income application must be verified.

Verification at the Time of Application

1. LEAs may require households to provide information to verify eligibility for free and reduced price benefits at the time of application. Schools electing this option are cautioned that they must not allow verification efforts to delay the approval of applications; nor can schools disapprove applications based on information submitted for verification. If an application is complete and indicates that the child is eligible for free or reduced price benefits, the application must be approved. Only after the determination of eligibility has been made can the school begin the verification process. Schools electing this option must observe the following procedures:
 - a) Notice to Household - Include in the notice to the household a statement that, although the initial eligibility determination will be based solely on the application, households are required to submit verification of eligibility information with the application.
 - b) Determination of Eligibility - As applications are returned, review each application to determine household eligibility based on the submission of a complete application. Households must be informed of this initial determination of eligibility. **Lack of verification information or submission of verification information that does not support the content of the application must not affect the initial determination of eligibility.**
 - c) Review of Verification Documentation and Notice of Adverse Action - Any household which fails to submit requested verification information by the date specified by the LEA or which submits verification information which does not support the initial determination of eligibility must be sent a notice of adverse action. This notice MUST include all the required items in the standard termination/reduction notice, including giving the household 10 days advance notice of the termination or reduction of their benefits. (Note: This step may be combined with Step 2 so that the notice of initial approval and notice of adverse action are combined in a single letter.)

Once households have been notified of selection and requested to provide income documentation, the LEA must complete the verification process for such households. Verification efforts should be completed within a reasonable time.

Household Notification of Selection for Verification

1. When a household is selected for verification and is required by the LEA to submit documents or other forms of evidence to document eligibility, the household must be sent a notice/letter informing them of their selection and of the types of information acceptable to the LEA (see pages 19-20). The letter/notice must include the following:
 - a) That the household has been selected for verification.
 - b) That the household must provide the social security number for each adult household member or indicate that a household member does not possess one.
 - c) A Privacy Act statement (See page 21 for the Privacy Act Statement).

- d) The types of acceptable information that may be provided to confirm income, including pay stubs, award letters from welfare departments, social security, and support payment decrees from courts (See page 21 for an example).
 - e) That the household MUST submit documentation of income for any point in time between the month prior to application and the time the household is required to provide income documentation. If this amount is not representative, the household should contact the LEA for assistance in determining acceptable documentation.
 - f) That the household may provide proof that the child is now receiving or received Food Stamp/Temporary Assistance benefits at any point in time between the month prior to application and the time documentation is required instead of providing income information and social security numbers of adult household members.
 - g) That information must be provided by a date as specified by the LEA and that failure to do so will result in termination of benefits.
 - h) The name and telephone number of a school official who can answer questions and provide assistance.
2. When the LEA uses agency records (see Agency Records on page 9) to verify eligibility, the letter/notice of selection is NOT required, since the household will not have to provide documents and household cooperation will not be necessary.

Verification Methods

1. Written Evidence - Written evidence is the primary source of eligibility confirmation for all households including Food Stamp and Temporary Assistance households.
 - a) Written evidence is most often pay stubs from employers or award letters from welfare departments or other government agencies submitted by the household to the verifying officials as confirmation of eligibility.
 - b) Acceptable written evidence contains the name of the household members, amount of income received, frequency received, and the date.
2. Collateral Contacts - A collateral contact is a person outside of the household who is knowledgeable about the household's circumstances and can give confirmation of a household's income or Food Stamp/Temporary Assistance status.
 - a) Collateral contacts include employers, social service agencies, migrant workers' agencies, and religious or civic organizations.
 - b) The verifying official should request a collateral contact only in cases when the household has not been able to provide adequate written evidence.
 - c) The verifying official must give the household the opportunity to

- designate the collateral contact. However, the verifying official may select a collateral contact if the household fails to designate one or designates one which is unacceptable to the verifying official. In either case, no contact may be made without first notifying the household and obtaining their permission.
- d) All collateral contacts are to be documented, dated, and initialed.

3. Agency Records - A household's eligibility may be confirmed through the use of information maintained by other government agencies to which the SA, LEA, or school has legal access. Although USDA regulations do not require that households be notified of selection when verification is made through agency records, such agencies may have their own notification requirements.
- a) One source of agency records is the wage and benefit information maintained by the state employment agency, if that information is available to the verifying official. Such records are state records, and the release of information maintained by state employment offices is governed by state law.
- b) The LEA may also submit the names and case numbers of categorically eligible households to the local Food Stamp or Temporary Assistance office. Food Stamp/Temporary Assistance offices are permitted by law to release eligibility information from their files to other federal assistance programs and federally-assisted state programs.
- c) When using agency records, the LEA should request information for any point in time between the month prior to application and the time the household is required to provide income documentation. Households which dispute the validity of income information acquired through systems of records must be given the opportunity to send more recent income information during the 10-day period of advance notice of adverse action. (See page 28).

Verification of Income Eligibility

Request for Written Evidence

1. The notification of selection for verification (sample on page 20) must include a request for the household to submit written evidence of income (from any point in time between the month prior to application and the time income documentation is required) for all household members and the social security number of each adult household member 21 years of age or older.
2. One of the following three situations will result:
 - a) The household submits the required social security numbers and written evidence of income that confirms the eligibility determination previously made. Verification is considered complete.
 - b) The household submits the required social security numbers and written evidence of income that shows the household's eligibility should be for either a higher or lower level of benefits than the eligibility determination previously made. Verification is considered complete when the letter of adverse action is sent or the household is notified that its benefits will be increased.
 - c) The household does not respond to the request for income information and/or

social security numbers or submits insufficient or obsolete evidence after a follow-up attempt has been made. When either situation occurs, the LEA can do one of two things:

- i) School officials may again contact the household to request the missing written evidence and inform the household that failure to comply or to designate a collateral contact will result in termination. If the household subsequently cooperates, then either a) or b) would apply.
- ii) School officials may terminate the household for failure to respond after the follow up request for written evidence. Verification is considered complete when the advance notice of adverse action is sent to the household.

Verification Using Collateral Contacts

1. When the household has been unable to provide adequate written evidence, the household may identify a collateral contact from which the LEA could obtain the requested information, either orally or in writing.
2. A collateral contact would not be expected to provide social security
3. numbers of the adult household members. These still MUST be provided by the household.
4. The LEA will examine any written information provided by the collateral contact or evaluate any oral information. Based on this, either situation a) or b) would apply.
5. If the collateral contact is unwilling or unable to provide the requested information, then the household is to be terminated for failure to respond as discussed in c).

Verification Using Agency Records

1. A household's eligibility may be confirmed through the use of information maintained by other government agencies to which the LEA has legal access. See page 8 for more details.
2. The LEA will examine the information received from the agency. Based on this review, either situation a) or b) would apply. Except that, households which dispute the validity of the information MUST be given the opportunity to provide additional income information during the 10-day advance notice period of adverse action.

Advance Notice of Adverse Action

1. All households with children for whom benefits are to be reduced or terminated MUST be given 10 days written advance notice of the change.
2. The first day of the 10 day advance notice period is the day the notice is sent.
3. A sample notification of adverse action is on page 28 and 29.

Verification of Categorical Eligibility

Request for Written Evidence

1. A school can place the responsibility for verifying receipt of Food Stamps/Temporary Assistance benefits on the household. The notification selection (sample on page 27) MUST include a request for the household to submit written evidence of certification to receive Food Stamp/Temporary Assistance benefits (from any point in time between the month prior to

- application and the time documentation is required). Every time a household is approved for Food Stamps/Temporary Assistance, they are furnished with a written letter of certification or notice of eligibility. The verifying official should examine this notice of eligibility to ensure that the child for whom application was made is part of a household is participating, or has participated at any point in time between the month prior to application and the time documentation is required, in the Food Stamp/Temporary Assistance Program
2. A Food Stamp/Temporary Assistance document that does not specify the certification period is not adequate for documentation. For example, the food stamp identification card is not acceptable because it usually does not have an expiration date.
 3. A household that does not have satisfactory Food Stamp/Temporary Assistance documentation may request a signed, dated letter from the
 4. Food Stamp/Temporary Assistance office certifying that the child is part of a household receiving Food Stamp/Temporary Assistance or has received benefits from any point in time between the month prior to application and the time documentation is required.
 5. Verification is complete when the household submits adequate documentation of participation in either the Food Stamp/Temporary Assistance Program or a letter of adverse action is sent.

Agency Records

1. Verification of eligibility for households that provided a Food Stamp/Temporary Assistance number on the application may be accomplished by submitting a list of names and Food Stamp/Temporary Assistance numbers to the local Food Stamp/Temporary Assistance office for confirmation of receipt of benefits (agency records).
2. To facilitate the verification process, contact should be made with the local Food Stamp/Temporary Assistance office prior to submitting such lists to discuss the methods by which verification requests should be handled. LEAs that verify eligibility through the local Food Stamp/Temporary Assistance office should do so as early as possible. This will ensure that there is sufficient time for that office to respond to the request, and sufficient time to acquire other verification if households lack adequate documentation for Food Stamps/Temporary Assistance or if the Food Stamp/Temporary Assistance office does not respond in a timely manner. If circumstances beyond the control of the LEA delay verification, the LEA may request that the SA allow an extension of the verification deadline. Any extension of the deadline must be approved by FNSRO.
3. A sample letter and a form for LEAs to use in requesting assistance from a Food Stamp/Temporary Assistance Office are included on pages 25-26.
4. Verification is complete when the local Food Stamp/Temporary Assistance office certifies that the household is receiving, or has received benefits from any point in time between the month prior to application and the time documentation is required, or a notice of adverse action is sent.

Advance Notice of Adverse Action

1. When it is determined that the child is not part of a household receiving/received (from any point in time between the month prior to application and the time

documentation is required) Food Stamp/Temporary Assistance, the household MUST be given 10 days written advance notice of termination and MUST be informed that to continue school meal benefits they MUST:

- a) Submit an application providing income information.
 - b) Submit names and social security numbers for each adult household member.
 - c) Submit written evidence which confirms the household's income from any point in time between the month prior to application and the time income documentation is required.
2. The first day of the 10-day advance notice period is the day the notice is sent.
 3. A sample notification of adverse action for Food Stamp/Temporary Assistance households is on page 29.

Completion of Verification

1. Verification of the required sample size MUST be completed by November 15 of each year. If the LEA believes that it will not meet this deadline, a written request for an extension MUST be submitted to the SA prior to November 15. This request MUST then be submitted to FNSRO for approval.
2. Verification of an application is complete when a household's eligibility for the level of benefits for which it was approved is:
 - a) Confirmed.
 - b) Changed to a higher level of benefit.
 - c) A letter of adverse action has been sent informing the household that benefits will be reduced.
 - d) A letter of adverse action has been sent informing the household that benefits will be terminated.

Verification Results

1. Verification of a household's income eligibility for free or reduced price meals MUST result in one of the following:
 - a) No change in benefit level - The household's documentation supports the level of benefits for which the household has been approved.
 - b) Reduction in benefit level - The household's documentation identifies income too high for the level of benefits for which the child has been approved. Therefore, the household's eligibility must be changed from free to reduced price or from free or reduced price to full price.
 - c) Increase in benefit level - The household's documentation qualifies the household for free meals rather than reduced price meals. Therefore, the household's eligibility MUST be changed from reduced price to free meals.
 - d) Termination of benefits - Free and reduced price benefits MUST be terminated for households that do not respond to verification efforts or lack adequate documentation to support eligibility for either free or reduced price meals.
2. If verification results in a change in benefit level or termination, the change MUST be extended to all children in the household who were determined eligible by information which no longer supports the benefit level.
3. If verification results in higher benefits (e.g., a child who is moved from the reduced price to free category), this change is effective immediately. Parents should be notified through whatever channels the LEA uses to notify the household of approval for benefits.

Notification of Adverse Action

1. All households for whom benefits are to be reduced or terminated MUST be given 10 calendar days advance notice of the change.
2. The first day of the advance notice period is the day the notice is sent.
3. The notice MUST advise the household of the following:
 - a) The change in benefits.
 - b) The reasons for the change.
 - c) That an appeal MUST be filed within the 10-day advance notice period to ensure continued benefits while awaiting a hearing and decision.
 - d) The instructions on how to appeal.
 - e) That the household may reapply for benefits at any time during the school year.
 - f) That Food Stamp/Temporary Assistance households may submit an application containing household names and income information and provide written evidence of household income and the social security numbers of adult household members.

Benefits During Appeal of Verification Results

1. When the household appeals a reduction or termination of benefits within the 10 calendar day advance notice period, the LEA MUST continue to provide the benefits for which the child was originally approved until a final determination is made.
2. When a household does not appeal a reduction or termination of benefits during the 10 calendar day advance notice period, the actual reduction or termination of benefits MUST take place immediately after the 10-day advance notice period.

Hearing Procedure

1. The hearing procedure in the LEA's free and reduced price policy statement MUST be followed.
2. The hearing official MUST be an individual who was not connected with the approval or verification process.
3. The household may request a school conference prior to a formal hearing. Any such conference MUST NOT prejudice a later appeal.

Households that Reapply for Program Benefits

1. Households affected by a reduction or termination of benefits may reapply for benefits at any time during the school year. However, those households terminated for failure to respond to verification efforts that reapply in the same school year may be required to submit income documentation or proof of participation in the Food Stamp/Temporary Assistance Programs at the time of reapplication. The LEA may verify the household's eligibility prior to approval. These are not considered new applications, since these households did not comply with the verification requirements.

Recordkeeping

1. Documentation is useful in demonstrating compliance with the verification requirements when LEAs are reviewed by the State and would also be needed in case of an applicant's appeal.
2. LEAs MUST maintain a description of their verification efforts. The description MUST include:
 - a) A summary of the verification efforts, including the selection process and the source of information used, such as the Food Stamp Office, wage stubs, and collateral contacts.

- b) The total number of applications on file on October 1.
- c) The percentage or number of applications that are/will be verified by November 15.
- d) Reasons for any denial or change of eligibility and the date.
- 3. All verified applications must be readily retrievable by school and include all documents submitted by the household in an effort to confirm eligibility, reproductions of those documents, or annotations made by the determining official which indicate which documents were submitted by the household and the date of submission.
- 4. All relevant correspondence between the household selected for verification and the LEA/school.
- 5. Results of verification and documentation/dates of any changes in eligibility or denial and the reasons for the changes or denial.
- 6. LEAs should keep a full record of:
 - a) Date notices were sent.
 - b) Notes on any contacts made.
 - c) Signature of confirming official.
- 7. See page 31, Verification Record.

Questions and Answers

1. Q. What kind of written evidence is required for verification of a foster child's application?
 - A. School officials should contact the household in which the foster child resides and ask for the name, agency and phone number of the social worker assigned to that child. A phone call to the social worker confirming the child's status as a foster child and the amount of money designated by the agency for the child's personal use would be sufficient verification. The school official should, document the phone conversation with the social worker (identifying the social worker, agency and phone number, the status of the child and the child's personal use income). Another approach would be to ask the foster family for a copy of a written communication between the foster family and the placement agency, in which the status of the child and the financial arrangement is stated. If the family is unable to provide such information, a phone call to the placement agency to confirm the child's status and income should be made prior to denying the child for free meals.
2. Q. What if a child is selected for verification, but then transfers out of the school district before the information can be verified?
 - A. Verification is considered complete when a household's eligibility for the level of benefits for which it was approved is either confirmed or a letter of adverse action has been sent. If a child is selected for verification but transfers out of the district before the information can be verified, verification cannot be completed. To meet the minimum verification requirements, a new application **MUST** be selected.
3. Q. What if I use other Agency records and the Agency does not provide a response before November 15?
 - A. Any extensions to the November 15 deadline **MUST** be approved in writing by FNS. If the LEA contacted another agency well in advance of the November 15 deadline, it has demonstrated good faith and would likely be given an extension.
4. Q. How is overtime income counted for the purposes of verification?
 - A. The school official should work with the household to determine whether the overtime for the month being verified is representative of overtime received in other months. If the overtime is a one-time or sporadic source of income, income should be calculated based on the regular monthly income (without overtime).
5. Q. Am I verifying eligibility at the time of application or current eligibility?
 - A. Verification is intended to establish eligibility. When written evidence or collateral contacts are the primary sources of information, the LEA **MUST** require submission of income information **from any point in time between the month prior to application and the time income documentation is required**. When using a system of records, the LEA may choose to verify a recent month and the entire sample may be verified for the same month. Households that dispute the validity of income information acquired through systems of records **MUST** be given the opportunity to produce additional income information.

6. Q: Must the LEA select the sample size of the applications from each school in the LEA or is the sample selected from the LEA as a whole?
- A. LEAs are required to select and verify a sample of their approved free and reduced price applications. The LEA as a whole **MUST** meet the required sample size. It does not mean that each school has to verify the total sample size. The sample may be selected from one or more schools or from the LEA as a whole, provided that the verification efforts are applied without regard to race, color, national origin, sex, age, or disability. Also, any selection method **MUST** meet the criteria for the required verification process; e.g., if the LEA has decided to select the sample size from only one school in the LEA, application selection must follow the requirements for the required sample method (Basic, Alternate I, or Alternate II).
7. Q. If my sample size is 4.2 applications, do I verify 4 or 5?
- A. 5. Partial numbers must be rounded up to the next whole number.
8. Q. If a larger sample is selected, such as 5 percent, does the 5 percent have to be verified by November 15?
- A. The LEA only has to meet the minimum sample requirements. Any additional applications selected, while they must be completed, may be completed after November 15.
9. Q. Do we have to maintain the actual documentation from verification or just the results of verification?
- A. LEAs are required to maintain a description of their verification efforts. The description **MUST** summarize the selection process and source of information used, the total number of applications on file on October 1, and the percentage or number of applications verified. *LEAs **MUST** maintain certain records of the actual information received, particularly records for those households whose benefits are reduced or terminated, since the actual documentation would be useful in supporting the verification findings if appealed by the household. *See Record keeping, page 14.
10. Q. Must LEAs include children from households approved under the Direct Certification process or certified as homeless, runaway, or migrant in the verification samples?
- A. No. Households certified under Direct Certification have already undergone a stringent application process for assistance and have had their eligibility verified under the Food Stamp or Temporary Assistance programs. Therefore, households approved for free meal benefits under Direct Certification are to be excluded from verification. Students certified as homeless, runaway, or migrant are not included in the verification process. LEAs must still select the appropriate minimum sample size from actual applications submitted. Accordingly, the size of the sample is based only on the number of approved applications submitted and not on the total of eligibility determinations.

BASIC SAMPLE SIZE METHOD WORKSHEET

REQUIRED SAMPLE SIZE

Number of approved applications on file on October 1:

x .03

_____ or 3000 applications, whichever is less.
(round all decimals up)

A random selection must be made from error-prone applications. Error-prone applications are approved applications indicating income within \$100 monthly or \$1200 annually of the maximum amount allowed for a household of a specific size to receive free or reduced price benefits.

ALTERNATE I (RANDOM SAMPLING) WORKSHEET

REQUIRED SAMPLE SIZE

Number of approved applications on file on October 1:

x .03

_____ or 3000 applications, whichever is less.
(round all decimals up)

Randomly select the required number of applications.

ALTERNATE II (FOCUSED SAMPLING) WORKSHEET

Required Number Of Applications With Income Information To Verify

Total number of approved applications on file on October 1:

x .01

= _____ or 1000 applications, whichever is less.
(round all decimals upward)

From the applications with income information, select applications with reported income within \$100 a month or \$1200 annually of the maximum amount allowed for a household of a specific size to receive free or reduced price benefits. Continue selecting applications until the required number of applications are chosen.

Required Categorically Eligible Sample

Total number of categorically eligible (food stamp/temporary assistance) applications.

x .005

= _____ or 500 applications, whichever is less.
(round all decimals upward)

From the applications with a Food Stamp or Temporary Assistance number, select applications until the required number of applications are chosen.

LETTER TO HOUSEHOLDS
NOTIFICATION OF SELECTION FOR VERIFICATION OF ELIGIBILITY

(student's name)

(school)

(date)

Dear: _____

This letter requires that you send information or contact (official's name) by (date).

Your child's application has been selected as part of a review to make sure only eligible students receive free or reduced price meal benefits.

You must send **either** (1) papers that show you receive, or received at any point in time between the month prior to application and the date above, Food Stamps or Temporary Assistance for your child **or** (2) the names and social security number of each adult household member on the enclosed sheet and papers that show your household's income from any point in time between the month prior to application and the time income documentation is required.

We have enclosed information that shows the kinds of papers that you may use to prove that you receive(d) Food Stamps or Temporary Assistance for your child or to show your household's income. If possible, do not send original papers. If you do send original documents, they will be sent back to you only if you ask.

If you do not send information that proves your child is eligible to receive free or reduced price meal benefits by (the date above), these meal benefits will be stopped.

If you have any questions, or if you need any help, please call:

_____, Telephone number:_____. If you do not hear from us by (date), free or reduced price meals will continue without change.

Thank you for your cooperation in this matter.

Sincerely,

Enclosures (Form for Social Security Numbers/Verification Information for Free and Reduced Price Meals)

In accordance with Federal law and U.S Department of Agriculture policy, this institution is prohibited from discrimination on the basis of race, color, national origin, sex age or disability. To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-6410, or call (800) 795-3272 (voice) or (202) 720-6382 (TTY). USDA is an equal opportunity provider and employer.

SOCIAL SECURITY NUMBERS

If you do not show that you receive(d) Food Stamps or Temporary Assistance for your child, send in (1) papers that show your household's income from any point in time between the month prior to application and the time income documentation is required and (2) the name and the social security number of each household member 21 years of age or older in the spaces below. Write the word "none" if an adult household member does not have a social security number.

Names of adult household members

Social security number

1. _____

_____ - _____ - _____

2. _____

_____ - _____ - _____

3. _____

_____ - _____ - _____

4. _____

_____ - _____ - _____

5. _____

_____ - _____ - _____

6. _____

_____ - _____ - _____

Privacy Act Statement: The National School Lunch Act requires that, unless you show that you receive Food Stamps or Temporary Assistance for your child, you must provide the social security number of each adult household member or indicate that the household member does not have a social security number. Provision of a social security number is not mandatory, but if a social security number is not provided for each adult household member or an indication made that an adult household member does not have a social security number, benefits will be terminated. The social security number may be used to identify household members in verifying the correctness of information stated on the application and continued eligibility for the program. These verification efforts may be through program reviews, audits, and investigations and may include contacting employers to determine income, contacting a food stamp or welfare office to determine current certification for receipt of Food Stamps or Temporary Assistance benefits, contacting the State Employment Security Office to determine the amount of benefits received and checking the documentation produced by household members to prove the amount of income received. These efforts may result in a loss or reduction of benefits, administrative claims or legal actions if incorrect information is reported. This information must be provided to each adult household member disclosing his/her social security number.

VERIFICATION INFORMATION FOR FREE AND REDUCED PRICE MEALS

FOOD STAMP/TEMPORARY ASSISTANCE HOUSEHOLDS: If you receive Food Stamps or Temporary Assistance for your child, you only have to send something that shows your household receives or received benefits at any point in time between the month prior to application and the time documentation is required. No other information is required. This can be:

- Food Stamp or Temporary Assistance Certification Notice showing the beginning and ending dates of the certification period
- Letter from the Food Stamp/Temporary Assistance office stating that you receive or received at any point in time between the month prior to application and the time documentation is required, Food Stamps or Temporary Assistance
- ATP Card (Authorization to Participate)

If your child was approved for free meals because you put a Food Stamp or Temporary Assistance number on your child's application, but you no longer receive Food Stamps or Temporary Assistance for your child and want to continue benefits, provide documentation that proves your eligibility for any point in time between the month prior to application and the time documentation is required.

HOUSEHOLDS THAT DO NOT RECEIVE FOOD STAMPS OR TEMPORARY ASSISTANCE: If you do not receive Food Stamps or Temporary Assistance for your child, (1) write the name and social security number for each adult household member on the enclosed sheet and (2) send copies of information or papers which show your household's income that proves eligibility from any one point in time between the month prior to application and the time income documentation is required.

The papers you send in must show: (1) The amount of the income received; (2) the name of the person who received it; (3) the date the income was received; and (4) how often the income is received.

To show the amount of money your household received, send copies of the following:

- **EARNINGS/WAGES/SALARY FOR EACH JOB:**
 - A paycheck stub from any one point in time between the month prior to application and the time income documentation is required that shows how often it is received
 - Pay envelope from any one point in time between the month prior to application and the time income documentation is required that shows how often it is received
 - Letter from Employer stating gross wages paid and how often they are paid
 - Business or farming papers, such as ledger or tax books
- **SOCIAL SECURITY/PENSIONS/RETIREMENT:**
 - Social Security retirement benefit letter
 - Statement of benefits received
 - Pension award notice
- **UNEMPLOYMENT COMPENSATION/DISABILITY OR WORKERS' COMPENSATION:**
 - Notice of eligibility from State Employment Security Office
 - Check stub
 - Letter from Workers' Compensation
- **CHILD SUPPORT/ALIMONY:**
 - Court decree, agreement or copies of checks received
- **ALL OTHER INCOME:** If you have other forms of income (such as rental income) send information or papers which show the amount of income received, how often it is received, and the date received.

NO INCOME: If you have no income, send a brief note explaining how you provide food, clothing and housing for your household and when you expect an income.

If you have any questions, or need help in deciding the kind of information to send, please call: _____ Telephone Number: _____.

LETTER HOUSEHOLD MAY HAVE EMPLOYER COMPLETE
STATEMENT OF EARNINGS

This statement is to confirm that (name of employee) received the following amount of gross income before deductions for taxes, social security insurance, etc. \$_____.

- ☐ weekly
- ☐ every two weeks
- ☐ twice a month
- ☐ monthly
- ☐ other _____

Please state the date of the paycheck listed above _____.

Signature of Employer Date

Address

Telephone Number

LETTER HOUSEHOLD MAY HAVE SOCIAL SECURITY OFFICE COMPLETE

SOCIAL SECURITY AND/OR SUPPLEMENTAL SECURITY INCOME (SSI)

This statement is to confirm that (Name of Claimant) received the following Social Security \$_____ or SSI income \$_____ for the month of _____.

Signature of Official _____ Date_____

Address _____

Telephone Number _____

**LETTER TO THE FOOD STAMP/TEMPORARY ASSISTANCE OFFICE
FROM THE Local Education Agency**

Dear _____:

The receipt of Food Stamps or Temporary Assistance automatically qualifies child(ren) for free school meals. The regulations for the Food Stamp Program and the Temporary Assistance Program permit Food Stamp and Temporary Assistance offices to release eligibility information to administrators of the National School Lunch and School Breakfast Programs to ensure that only eligible children receive free meal benefits.

Enclosed is a listing of approved free meal applications selected for verification and have indicated that the child for whom application was made now receives Food Stamps and/or Temporary Assistance benefits. On the enclosed listing, please indicate if these household members are participating, or participated, in the Food Stamps and/or Temporary Assistance Program during the dates indicated. This information will be used only to confirm the approved applicant's eligibility for free meal benefits.

Your return of the listing by _____ will be appreciated. A self-addressed return envelope is also enclosed for your convenience. If you have any questions, or need additional information, please contact _____ at Telephone Number _____.

Sincerely,

Signature

Date

Address

Telephone Number

Enclosure (Verification Form-Food Stamp/Temporary Assistance Recipients).

**VERIFICATION FORM - FOOD STAMP/TEMPORARY ASSISTANCE RECIPIENTS
(Multiple Applicants)**

Adult Member Last Name, First	Child's Name Last Name, First	Date Range*	Food Stamp/Temporary Assistance Number	Participated Yes No

Signature of Food Stamps (Temporary Assistance) Official Date

Address

Telephone Number

* Enter a date range from the month prior to application to the date verification documentation is required.

**LETTER HOUSEHOLD MAY HAVE FOOD STAMP/TEMPORARY ASSISTANCE
OFFICE COMPLETE**

STATEMENT OF FOOD STAMP/TEMPORARY ASSISTANCE BENEFITS

(Name of Child)

(Name of Parent/Guardian)

This statement is to confirm that the child named above is/was certified to receive Food Stamps or Temporary Assistance benefits at any point in time between the month prior to application and the date verification documentation is required. The household's case number is _____.

The household is/was receiving Food Stamps or Temporary Assistance benefits during _____
(period of time).

Signature of Food Stamp (Temporary Assistance) Official

Date

Address

Telephone

**LETTER OF VERIFICATION RESULTS AND ADVERSE ACTION
FOR INCOME HOUSEHOLDS**

(Note: Make changes as applicable for the School Breakfast Program)

Child(ren)'s Name(s): _____

School: _____ Date: _____

Dear _____:

We have completed verification of your child(ren)'s eligibility.

Starting on (10 calendar days from the date sent) your child(ren)'s eligibility for meals benefits will be:

_____ Changed from free to reduced price because your income is over the allowable amount. The reduced price charge is _____ cents for lunch and _____ cents for breakfast.

_____ Stopped for the following reason(s):

_____ your income is over the allowable amount for free or reduced price meals;

_____ you did not provide proof of eligibility. The following information is missing:

Starting immediately your child(ren)'s eligibility for meal benefits will be:

_____ Changed from reduced price to free because your income is within the free meal eligibility limits. Your child(ren) will receive meals at no cost.

If you are not eligible for benefits now, but have a decrease in household income, become unemployed, or have an increase in the size of your household, you may fill out an application at that time to reapply for benefits.

If you do not agree with the decision, you may discuss it with: _____ (verifying official). You also have the right to a fair hearing. If you request a hearing by _____ (date), your child(ren) will continue to receive free or reduced price meals until the decision of the hearing official is made. You may request a fair hearing by calling or writing the following official:

Name: _____

Address: _____

Telephone Number: _____

Sincerely,

In accordance with Federal law and U.S Department of Agriculture policy, this institution is prohibited from discrimination on the basis of race, color, national origin, sex age or disability. To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-6410, or call (800) 795-3272 (voice) or (202) 720-6382 (TTY). USDA is an equal opportunity provider and employer.

**LETTER OF ADVERSE ACTION FOR FOOD STAMP/TEMPORARY ASSISTANCE
HOUSEHOLDS**

Dear _____:

Date: _____

Available records show that your household is/was not receiving Food Stamps/Temporary Assistance the month prior to application and the date verification documentation is required.

To continue benefits for your child:

1. complete a new application with income information;
2. write the name and social security number of each adult household member on the attached form
3. send in papers that show your household's income from any point in time between the month prior to application and the time income documentation is required.

Your child's free school meal benefits will be stopped on (insert date 10 days from the above date) unless we receive this information.

If you do not agree with the decision, you may discuss it with (school official) by calling (telephone number).

You also have a right to a fair hearing. This can be done by calling or writing the following official:

Name: _____

Address: _____

Phone: _____

If you request a hearing by (insert date 10 days from the date sent), your child will continue to receive free meals until the decision of the hearing official is made.

If you are not eligible for benefits now, but your household circumstances change, you may fill out an application at that time and reapply for benefits.

Sincerely,

Enclosures (Form for Social Security Numbers/Verification Information for Free and Reduced Price Meals)

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**NOTIFICATION OF CONTINUATION OF BENEFITS
AS A RESULT OF VERIFICATION**

(Optional)

Date: _____

Dear _____:

Thank you for cooperating with the (name of Local Education Agency) in its verification of eligibility for school meal benefits. The materials you have sent are sufficient for us to verify that your child is eligible for the meal benefits he or she is receiving.

We appreciate your cooperation and support during this process. If you have any questions concerning our program, please feel free to contact our office.

Sincerely,

In accordance with Federal law and U.S Department of Agriculture policy, this institution is prohibited from discrimination on the basis of race, color, national origin, sex age or disability. To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-6410, or call (800) 795-3272 (voice) or (202) 720-6382 (TTY). USDA is an equal opportunity provider and employer.

VERIFICATION RECORD

FREE AND REDUCED PRICE APPLICATION INCOME VERIFICATION DOCUMENTATION

Agreement No. _____

NAME OF LEA/SCHOOL _____

ADDRESS _____

A. How were the applications to be verified selected?

_____ Basic Sample

_____ Alternate I (Random Sample)

_____ Alternate II (Focused Sample)

_____ 100% Verified

_____ Other (specify) _____

B. By what date was the verification process completed? _____

C. How many correctly approved free and reduced price
eligible applications were on file October 1? _____

D. How many applications were verified? _____

E. Percent of applications verified (D divided by C). _____

F. How many of Item D were changed from:

1) free eligible to reduced price eligible? _____

2) free eligible to paid? _____

3) reduced price eligible to free eligible? _____

4) reduced price eligible to paid? _____

"I certify this information to be correct to the best of my knowledge."

Signature _____

(Authorized Representative)

(Retain on file with processed applications.)

VERIFICATION SUMMARY

The following is a brief summary of the approved sample selection methods and the verification process.

Note: Students who have been approved for free meals through the direct certification process or children certified as homeless, runaway, or migrant are not to be included in the verification procedure.

- Sample Selection Methods - Each Local Education Agency must select one of the following methods to satisfy the verification requirement:

Basic Sample- At least 3% or 3000 (whichever is less) of all approved applications. The basic sample must be drawn from error-prone applications (application indicating income within \$100 monthly or \$1200 annually of the maximum amount allowed for a household of a specific size to receive free and reduced price meal benefits).

Alternate I (Random) - At least 3% or 3000 (whichever is less) of all approved applications selected randomly.

Alternate II (Focused) - The sample size is determined by selecting 1 percent of all approved applications or 1000 (whichever is less) with sample selected from error-prone applications; plus the lesser of .5 percent (half of 1 percent) or 500 applications approved on categorical eligibility (Food Stamp or Temporary Assistance). If there are not enough error-prone applications LEAs must select the remainder to be verified from applications with monthly incomes closest to the eligibility guidelines.

100% Verification - LEAs may elect to verify all approved applications.

- Verification Process

- On October 1, count the approved applications for free or reduced price meals.
- Determine the previous year's non-response rate.
- Select the verification method that must/will be used.
- Calculate the number of applications that must be verified.
- Select the applications for verification.
- Of the applications selected, the confirming official should confirm the accuracy of the original approval.
- Notify households of selection for verification; and/or provide written contact to the local Food Stamp/Temporary Assistance office for confirmation of benefit eligibility.
- Examine documents submitted by households; and/or review results obtained from the local Food Stamp/Temporary Assistance office contact.
- Notify households of continued benefits or changes in benefit level.
- Verification must be completed by November 15.
- Complete and submit the Free or Reduced Price Lunch Verification Summary Report to the State Agency.